

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This document relates to Civil File Nos.  
17-2832, 17-4613, 17-4614, 17-4615,  
17-4616, 17-4617, 17-4618, 17-4619,  
17-4622, 17-4943, 17-4944, 17-4945,  
17-4947, 17-5046, 18-1562, 18-1565,  
18-1572, 18-1573

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**MOTION TO COMPEL DEPOSITION OF NANCY J. MOORE  
AND TO ADD ONE WEEK TO BRIEFING SCHEDULE  
EXPEDITED HANDLING REQUESTED**

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Proposed Intervenor and Movants Keisha Covington, Daniel Sokey, Tiffany Van Riper, James Watkins, Jaclyn Finafrock, and Kelly Johnson (“Proposed Intervenor”) respectfully move this Court for an Order:

1. Compelling CenturyLink’s expert witness Professor Nancy J. Moore to appear for a deposition to be taken by videoconference within 7 days of the Court’s order; and
2. Amending the briefing schedule for CenturyLink’s related Motion to Disqualify (ECF 634) to accommodate the above discovery as follows:
  - a. Proposed Intervenor’s opposition brief will be due May 13, 2020;

- b. Class Plaintiffs' and CenturyLink's replies will be due May 27, 2020;  
and
- c. Oral arguments for Movants' Motion to Intervene, Compel Arbitration, and Stay Proceedings [Docket No. 596], the Amended Motion to Disqualify [Docket No. 641], and on any motions related to the validity of the Opt-Out Letter shall be heard on a date and at a time to be set by the Court.

Movants' Motion is based upon the attached memorandum of law, declaration and exhibits, existing court record, and arguments of counsel.

Dated: April 24, 2020.

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